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8 UNITED STATES DISTRICT COURT  
9 NORTHERN DISTRICT OF CALIFORNIA  
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11  
12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 DANIEL RANGEL,

16 Defendant.  
17

) CR NO. 07-00788 JF (NC)  
)  
)  
)

) **UNOPPOSED** MOTION FOR EXTENSION  
) OF TIME TO FILE SETTLEMENT STATUS  
) REPORT AND

) ~~PROPOSED~~ ORDER THEREFORE  
)  
)

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19 On June 22, 2012, the Court entered an order that said, among other things, that  
20 "Defendants Geffen and Rangel must file Settlement Status Reports on [Thursday,] July 5,  
21 2012."

22 Current Settlement Status

23 Today (Friday, June 29) Pretrial Services sent a letter to counsel for both parties formally  
24 finding Mr. Rangel eligible for pretrial diversion and recommending that he be placed on pretrial  
25 diversion. Other than resolving a possible typo in Pretrial's letter, the only thing that remains is  
26 for the parties to agree on and execute the formal diversion agreement. This agreement has been  
27 previously discussed by counsel for both parties, and undersigned counsel does not anticipate  
28 any problems.

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Undersigned defense counsel will be out of town from Sunday, July 1 through July 5 (the date set in the Court's order for the filing of Settlement Status Reports). The prosecutor has indicated via e-mail that although he is not in today (Friday, June 29) he will provide me with a draft of the formal diversion agreement on Monday, July 2. I will be able to receive it via e-mail while I am out of town, but I will not be able to e-file a Status Report until I return (I can receive and read e-mailed documents on my mobile device but I cannot not e-file documents from it—I have already tried). A short extension of time should give us time to finalize the agreement and allow defense counsel to file a Status Report regarding the same as contemplated in the Court's order. The preceding paragraph gives the Court the status of our settlement as of today (June 29).

Accordingly, defense counsel respectfully requests an extension of time to and including Monday, July 9, to file a Settlement Status Report on behalf of Mr. Rangel. The prosecutor, Mr. Nedrow, has graciously stated that he has no objection to this request. A [Proposed] Order is below.

June 29, 2012

Respectfully submitted,

/s/ Mark D. Eibert  
Mark D. Eibert  
Attorney for Defendant Daniel Rangel

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IT IS SO ORDERED.

*Lucy H. Koh*  
HON. LUCY H. KOH  
UNITED STATES DISTRICT JUDGE